



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

112104

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

OCT 11 1991

In Reply Refer To: 3HW11

President
Benchmark Analytics
1776 Main Street
Hellertown, PA 18055

Re: Hellertown Manufacturing Co. Superfund Site

Dear Sir or Madam:

The U.S. Environmental Protection Agency (EPA) is seeking information concerning a release, or the threat of release, of hazardous substances, pollutants or contaminants into the environment at or from the Hellertown Manufacturing Co. Superfund Site (the Site). The Site is located in the Borough of Hellertown, Northampton County, Pennsylvania.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. Section 9604(e), Paikes Enterprises, Inc. (hereinafter "you" or "your company") is required to furnish all information and documents in its possession, custody or control, or in the possession, custody or control of any of its employees or agents which concern, refer, or relate to hazardous substances, as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), pollutants and/or contaminants, which were transported to, stored, treated, or disposed of at the Site.

The provisions in Section 104 of CERCLA, 42 U.S.C. Section 9604, authorize EPA to pursue penalties for failure to comply with these sections or for failure to respond adequately to required submissions of information. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. Section 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

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EPA hereby requires that you provide the following information and any documents referring or relating to that information within 20 calendar days of your receipt of this letter:

1. Representatives of Your Company:

a. Identify the person(s) answering these questions on behalf of your company, including full name, business address and telephone number, and relationship to your company.

b. Provide the name, title, business address and telephone number of the individual representing your company to whom future correspondence or telephone calls should be directed.

2. State the name of your company, the state in which it is incorporated, if any, and its mailing address and telephone number. Identify the parent corporation, if any, and all subsidiaries.

3. What is the nature of your company's business?

4. How many people does your company employ?

5. List the addresses of other facilities owned by your company.

6. Provide copies of any deeds, leases, rights-of-way or other real interests which your company has in the Site.

7. Provide the date when your company started operating a facility at the Site.

8. Describe all of your company's activities at the Site since the date provided in response to question #7, above.

9. Provide the types and annual quantities of wastes generated by your company at the Site between the date provided in response to question #7, above, and the present. Include copies of any analyses performed on these wastes.

10. For each of the wastes described in response to question #9, above, provide the method of treatment and/or disposal used by your company between the date provided in response to question #7, above, and the present. For those wastes treated and/or disposed of off-site, provide the names and addresses of the transporters and treatment/disposal facilities used.

11. Provide the names, addresses, telephone numbers, social security numbers, titles and areas of responsibility of your employees, both present and former, who are knowledgeable about your company's waste treatment and disposal methods between the date provided in response to question #7, above,

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12. Identify all property and casualty insurance policies issued to you or your company between the date provided in response to question #7, above, and the present, including comprehensive general liability insurance and environmental impairment insurance. In your response, identify the insurer, the name of the insured(s), the type of policy, policy numbers and effective dates and per occurrence limits. In addition, provide copies of any such policies.

13. Provide any other or additional information which you believe to be relevant to the EPA investigation of the Site.

As used herein, the term "documents" means: writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agenda, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phono-records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer printouts, or other data compilations from which information can be obtained or translated.

You are entitled to assert a claim of business confidentiality covering any part or all of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you. A claim of confidentiality shall not be justification for refusal to provide the required information.

Please submit the required information in writing within 20 calendar days of your receipt of this letter.

All documents and information should be sent to :

William L. Walsh (3HW11)
U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107

If you have any questions concerning this matter, please contact Mr. Walsh at (215) 597-1192.

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This request for required information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

Sincerely,



Kenneth R. Kryszczun, Chief
Superfund Programs Branch

cc: William Walsh (3HW11)
Patricia Hilsinger (3RC33)

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